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Attorneys for Defendants  
VERIZON WIRELESS and VERIZON SOURCING LLC

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

TELECOM ASSET MANAGEMENT, LLC

Plaintiff,

v.

CELLCO PARTNERSHIP dba VERIZON  
WIRELESS; VERIZON SOURCING LLC;  
VERIZON COMMUNICATIONS INC.; and  
DOES I through X, inclusive,

Defendants.

Case No. 3: 14-CV -05021-WHA

**DEFENDANTS' MOTION FOR ORDER AND  
~~PROPOSED~~ ORDER PERMITTING  
WITHDRAWAL AND SUBSTITUTION OF  
COUNSEL**

(CIV. L.R. 7-11 AND 11-5)

Ctrm: 8, 19th Floor  
Judge: Honorable William Alsup

**MOTION**

Pursuant to Civil L.R. 7-11 and 11-5, Defendants Verizon Wireless and Verizon Sourcing LLC (“Verizon”) hereby moves the Court for an order permitting the withdrawal of its counsel of record, Bobbie Rae Bailey, Glen Silverstein, and Frederick W. Gatt of Leader & Berkon LLP, and the appearance of substitute counsel, Joshua H. Lerner and Laura E. Miller of Durie Tangri LLP, on its behalf in this action. Verizon respectfully submits that said substitution of counsel is in the interests of justice.

Verizon, Leader & Berkon LLP, and Durie Tangri LLP consent to such withdrawal and substitution of counsel.

Accordingly, Verizon respectfully requests that the Court enter an order reflecting this change, and that all necessary changes be made to the Court’s records and ECF, and that all future communications regarding this case be directed to the following:

DURIE TANGRI LLP  
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Counsel for Plaintiff, Frank Kollman, Michelle Carter and James Allen Carter of Carter Carter Fries & Grunschlag, were informed of the proposed substitution motion on February 11, 2015 and indicated that Plaintiff does not oppose the substitution.

This motion is not made for purposes of delay or any other improper purpose.

WHEREFORE, Verizon respectfully requests this Court enter its Order permitting withdrawal and substitution of counsel for Verizon, and update the Court’s ECF system for this case by removing Bobbie Rae Bailey, Glen Silverstein, and Frederick W. Gatt of Leader & Berkon LLP as counsel of record and substituting in their place Joshua H. Lerner and Laura E. Miller of Durie Tangri LLP as counsel of record for Verizon.

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1 Dated: February 12, 2015

DURIE TANGRI LLP

2 By: /s/ Joshua H. Lerner

3 JOSHUA H. LERNER  
4 LAURA E. MILLER

5 Attorneys for Defendants  
6 VERIZON WIRELESS and VERIZON SOURCING  
7 LLC

8 Dated: February 12, 2015

LEADER & BERKON LLP

9 By: /s/ Glen Silverstein

10 BOBBIE RAE BAILEY  
11 GLEN SILVERSTEIN  
12 FREDERICK W. GATT

13 Attorneys for Defendants  
14 VERIZON WIRELESS and VERIZON SOURCING  
15 LLC

16 Dated: February 12, 2015

VERIZON WIRELESS and VERIZON SOURCING  
17 LLC

18 By: /s/ Robert P. Slevin

19 ROBERT P. SLEVIN

20 **FILER'S ATTESTATION**

21 Pursuant to Civil L.R. 5-1(i)(3), regarding signatures, I, Joshua H. Lerner, attest that concurrence  
22 in the filing of this document has been obtained.

23 Dated: February 12, 2015

24 By: /s/ Joshua H. Lerner


25 JOSHUA H. LERNER

**PROPOSED ORDER**

Having reviewed and considered Defendants Verizon Wireless and Verizon Sourcing LLC's ("Verizon") Motion for Order Permitting Withdrawal and Substitution of Counsel, and good cause appearing, the Court hereby orders that Bobbie Rae Bailey, Glen Silverstein, and Frederick W. Gatt of Leader & Berkon LLP be permitted to withdraw as counsel of record, and Joshua H. Lerner and Laura E. Miller of Durie Tangri LLP may appear as substitute counsel of record for Verizon. The Court's ECF system shall be updated to reflect these changes.

**IT IS SO ORDERED.**

Dated: February 17, 2015.

  
WILLIAM H. ALSUP  
United States District Judge